

Feedback from the Organic Cotton Accelerator on the Revision of EU Public Procurement rules

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ORGANIC COTTON ACCELERATOR

The Organic Cotton Accelerator (OCA) urges the European Commission to promote the use of organic cotton in the revision of the EU public procurement framework. Fibre choice directly determines the environmental footprint and social impact of textile products throughout their entire lifecycle. Prioritising organic cotton and other sustainable fibres in public procurement can help reduce emissions, water use, and pollution, while supporting biodiversity, soil health, and farming communities, creating lead markets that deliver both environmental and social value.

OCA calls on the European Commission to prioritise social and environmental criteria over price in procurement decisions and to support public buyers who choose organic cotton products. Furthermore, OCA recommends updating the Green Public Procurement criteria to broaden their scope ensuring a just transition, and to better monitor sustainability in public contracts. Drawing on evidence from our LCA study and other credible scientific research, this paper points at the policy tools that can be leveraged in the current revision to promote organic cotton in public procurement.

Context

OCA welcomes the European Commission's initiative to revise the EU public procurement framework and supports its objective to make public procurement a tool for strategic investment.

Every year, public authorities across the EU spend around 16% of GDP, approximately €2.5 trillion, on the purchase of services, works and supplies (European Commission, n.d.-a). While EU public procurement rules allow contracting authorities to consider multiple criteria when awarding contracts, in practice 55% of procedures rely solely on the lowest price, often overlooking sustainability criteria (European Commission, n.d.-b). More attention needs to be paid to environmental impact and social considerations. The revision of the framework presents an opportunity to drive alignment between procurement policies and EU-wide environmental and social strategic objectives.

Why organic cotton in the context of public procurement

The textile industry remains one of the most resource- and emission-intensive sectors in the global economy. Emissions are generated at multiple stages of the value chain, from fertilisers and pesticides in fibre cultivation to land-use change, energy-intensive processing, and heavy reliance on fossil fuels in material production. Environmental and social impacts begin at the very start of the supply chain, with raw material extraction alone accounting for 21% of the sector's emissions (Circle Economy, 2024). This makes fibre choice strategic for green procurement because it directly determines the environmental footprint and social impacts of textile products over their entire lifecycle.

The [Clean Industrial Deal](#) sets the objective of making 24% of materials used in the EU circular by 2030. Achieving this target requires prioritising textile products made from sustainably sourced renewable materials and replacing those made by fossil-based materials, which currently represent 88% of global output (Textile Exchange, 2025).

Cotton is the world's second most used textile fibre and the largest driver among natural fibres, and its conventional production often involves significant environmental and social costs. The [EU Agriculture and Food Vision](#) officially recognises organic farming as best practice in generational renewal and protection of ecosystem services, reinforcing the need to integrate materials like organic cotton into policy frameworks. By avoiding synthetic pesticides, synthetic fertilisers, and genetically modified seeds, organic cotton represents a sustainable and regenerative approach to cotton production that benefits farmers and nature. In spring 2025, OCA published a [regional Life Cycle Assessment from India](#) demonstrating that organic cotton consistently yields lower greenhouse gas emissions, reduced water usage, and fewer pollutants compared to conventional cotton, consistent with other scientific literature and industry reports.

Public procurement can play a pivotal role in advancing the objectives of the European Green Deal, the Clean Industrial Deal, and the Competitiveness Compass. In this context, we invite the European Commission to promote the use of organic cotton in the Revision of the EU public procurement framework.

Our recommendations for the revision

1. Prioritise social and environmental considerations over price in public procurement decisions

Leveraging established third-party certifications can support public buyers in applying the Most Economically Advantageous Tender (MEAT) criteria.

The prioritisation of price in public tenders disadvantages sustainable textile products whose prices reflect higher investments in social and environmental outcomes. To avoid this, the revision should make the Most Economically Advantageous Tender (MEAT) the default criteria. Instead of focusing solely on the lowest price, MEAT prioritises best value for money by considering quality, environmental and social considerations, life-cycle costs, and innovation (European Parliament, 2025).

In the case of organic cotton, there are established standards and traceability systems that verify the presence and amount of organic material in the final product and track the flow of raw materials from the source to the final product. Beyond the environmental and social benefits associated with sustainable raw material production, the non-toxic processing required by organic cotton standards ensures that products are free from harmful chemical residues (B.P., Veena, & Hegde, 2025). This makes organic cotton products safer for consumers and particularly suitable for sensitive applications, such as in the healthcare sector. These standards are recognised as equivalent to the EU Ecolabel by both EU and national Green Public Procurement (GPP) criteria.¹

2. Support public buyers who opt for organic cotton products ensuring alignment with relevant policies

The Commission should reinforce the role of GPP criteria through the Eco-design for Sustainable Products Regulation (ESPR) implementing acts.

Raw material choice directly determines the environmental footprint and social impacts of textile products. The [New EU Bioeconomy Strategy](#) recently emphasised the need to create lead markets for bio-based materials and clean strategic technologies through the revision of EU public procurement legislation. However, OCA has drawn attention on the fact that not all bio-based textiles are inherently low-impact. The promotion of bio-based alternatives must be guided by sustainability criteria recognised in credible international standards, encompassing environmental, social, and governance considerations throughout sourcing, cultivation, and processing. Organic cotton demonstrates how such criteria can be effectively met and should be prioritised as a benchmark for sustainable bio-based textiles.

By creating stable demand, public procurement can accelerate the uptake of materials like organic cotton and help overcome availability challenges (Joint Research Centre, 2017). The ESPR offers the general framework, with specific requirements to be set at the product-group level. The “use of content of sustainable renewable materials” is listed in Annex I of ESPR as a parameter to improve product aspects. We therefore invite the Commission to introduce GPP criteria for public contracts that promote organic cotton through the ESPR implementing acts, providing targeted incentives and aligning regulatory frameworks with industry realities.

3. Advance sustainable textile procurement by updating practical guidance and improving monitoring and measuring of sustainability in public contracts

Integrating sustainability into public procurement requires more practical evidence on GPP implementation highlighting both challenges and success stories.

The [EU Green Public Procurement \(GPP\) Criteria for Textile Products and Services](#), together with the accompanying guidance documents, provide a robust framework for integrating innovative, environmental criteria into public procurement. As early as 2013, the Joint Research Centre (JRC) recommended increasing the minimum proportion of certified organic fibre in public procurement, suggesting a 10% organic cotton content as a baseline and a 95% requirement for specified textile products (Joint Research Centre, 2013). More recently, in 2020, the JRC presented a series of case studies illustrating the challenges of implementing GPP technical specifications and comprehensive criteria, including minimum organic cotton content requirements (Joint Research Centre, 2020). To address availability challenges, the JRC recommended that contracting authorities should conduct early market consultations or issue prior information notices to alert potential bidders about upcoming contracts and expected volumes. It was also suggested that bidders should be encouraged to source cotton through collaborations with agricultural development projects that support organic and regenerative cotton production.

In order to update EU GPP criteria implementation guidelines, greater emphasis is needed on monitoring and measuring sustainability in public contracts, as significant data gaps remain. However, as flagged by the JRC, it is not possible to understand the uptake of the EU GPP criteria due to both their voluntary nature and the lack of a framework to collect procurement data (Joint Research Centre, 2025).

4. Integrate social considerations alongside environmental criteria to drive a just and inclusive transition

The EU procurement framework must strengthen human and social rights, including fair labour practices, living wages, and transparency throughout supply chains.

Green Public Procurement should equally aim to minimise environmental impacts and to promote social justice, safeguarding the livelihoods of farming communities. Public procurement policies have a role to play in supporting farmers in adopting sustainable farming practices by incentivising the use of textile products made with organic fibres.

Genuinely sustainable fibres such as organic cotton have the potential to contribute to climate resilience, biodiversity, and rural prosperity, but farmers often face systemic challenges during the transition to sustainable farming: limited market access, scarce financial resources, and precarious working conditions, to name a few. Without targeted support, these farmers risk deepening poverty and may revert to unsustainable practices, undermining both environmental and social goals. By embedding social and environmental considerations equally, public procurement can contribute to a truly just and inclusive transition that protects both the planet and the livelihoods of vulnerable communities.

Conclusion

The European Union can use procurement to boost jobs, growth and investment, while creating an economy that is more innovative, resource and energy efficient, and socially inclusive. Promoting sustainable fibres like organic cotton can generate environmental benefits while protecting vulnerable smallholder farmers in the deeper tiers of global supply chains. As long as public contracts are awarded mostly based on price, sustainable textile products remain in competitive disadvantage, at least until the economy of scale is in place. Public procurement should reward textile products produced under the highest social and environmental standards. With ambitious policy support, organic cotton can deliver meaningful change across global supply chains, beginning at the farm level.

OCA remains committed to supporting the European Commission in the pursuit of EU environmental goals through evidence from our farmer programmes and industry partnerships. We stand ready to engage further with the Commission on the implementation of these recommendations.

About the Organic Cotton Accelerator

OCA is a multi-stakeholder organisation dedicated to advancing farmer prosperity and ensuring a transparent, resilient, and responsible organic cotton supply chain. Established in 2016, OCA brings on-the-ground evidence from over 100,000 organic cotton farmers from India, Pakistan and Türkiye, and 60 partner organisations, offering practical insight into how EU policy can drive both circularity and social impact.

References

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- Joint Research Centre. (2025) [Preparatory Study on Textile Products, Working document of the 3rd milestone](#)

Research resources

- Organic Cotton Accelerator. (2025). [Life Cycle Assessment of Lint Cotton in India](#)
- Organic Cotton Accelerator. (2025). [The Case for Organic Cotton](#)

Additional resources

- [OCA's position on ESPR](#)
- [OCA's recommendations for the Circular Economy Act](#)



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Uniting the sector to realise the Organic Cotton Effect

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